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Amdt. dated March 1, 2004
Reply to Office action of November 28,2003

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REMARKS

Applicant thanks the Examiner for the careful review of this application. Only claim 17 has been amended. Claims 1-25 remain pending.

Objections to Drawing under 37 CFR 1.83(a)

The Examiner objected to the drawings under 37 CFR 1.83(a) for failing to show GUI screenshots of the configuration process and username/password issuing as described in the specification.

Applicant respectfully disagrees. In the present invention the Applicant is claiming the functionality of providing a username and password by a local client to establish communication between the local client and a remote client. Figure 2A shows an example screen shot and adequately illustrates the functionality of providing a username and a password by a local client. Figure 2B also shows that a user providing a password at an access password input to access a host adapter connected to the remote client. Moreover, by the provided teachings and examples, one skilled in the art would know the process of adding a username and a password to a query without further illustrations. Therefore, the Applicant respectfully requests that the objection to the drawings be withdrawn.

Rejections under 35 U.S.C. § 112, second paragraph:

The Examiner rejected claim 17 under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In particular, the Examiner noted that the phrase "may" renders claim 17 indefinite because it is unclear whether the limitation(s) following the phrase are part of the claimed invention. The Applicant has amended claim 17 accordingly to clarify the claimed invention. As a result, Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. § 112, second paragraph rejection.

Anticipation Rejections under 35 U.S.C.§ 102(e)

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The Examiner rejected claims 1 and 6 under 35 U.S.C § 102(e), as being anticipated by Orr et al. (Orr) (U.S. Pat. 6,463,459). The rejection is respectfully traversed. For the reasons put forth below, Applicant respectfully asserts that Orr fails to identically disclose each and every feature specified in independent claim 1.

The Applicant believes that the differences between Orr and the claimed invention are significant. The Applicant finds the Office's characterization of Orr to be incorrect. Specifically, Orr teaches a system and method for executing commands on a specific virtual desktop operating in a multi-user server environment (*see* Abstract, lines 1-2). According to Orr each time a user logs on to a client, a virtual desktop is created. The virtual desktop is defined for any user logged on session in a multi-user environment (col. 3, lines 40-44). The Examiner asserts that Orr's virtual process agent (VP agent) and virtual process broker (VP broker) and the remote client and the local client in the claimed invention are the same. However, in Orr, both VP agent and VP broker are two processes executed on a server (col. 3, lines 47-50).

In contrast, in claim 1 of the claimed invention the local client and the remote client may be any personal computer or any other networkable device that includes at least a memory and a processor. The local client and remote client are real machines and not virtual processes like in Orr. As such, peripheral devices may be attached to them, which is not the case with Orr's virtual processes. The claimed invention teaches a method for the local client to access an adapter connected to the remote client as if the adapter of the remote client were physically connected to the local client.

Here, in view of the incorrect characterization of Orr, the reference does not teach all the features of the claimed invention. Since dependent claim 6 depends directly from independent claim 1, the references Orr-Guheen as combined do not teach all the features of the claimed invention. Applicant submits that the dependent claim 6 is patentable under 35 U.S.C. § 102(e) for the same reason set forth above. Accordingly, Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. § 102(e) rejection of claims 1 and 6.

Obviousness Rejections under 35 U.S.C.§ 103(a)

Claims 2 and 3 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Orr as applied to claim 1, in view of Guheen et al. (Guheen) (U.S. Pat. 6,615,166). Claims 4-5 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Orr. Claims 7-8 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Orr as applied to claim 1, in view of

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Kempf et al. (Kempf) (U.S. Pat. 6,374,308). Claims 9-11 are rejected under 35 U.S.C. §
103(a) as being unpatentable over Orr as applied to claim 1 above, in view of McNeill Jr. et
al. (McNeill) (U.S. Pat. 5,721,880). Claims 12, 15, and 19 are rejected under 35 U.S.C. §
103(a) as being unpatentable over Orr in view of McNeill. Claims 13-14 are rejected under
35 U.S.C. § 103(a) as being unpatentable over Orr. Claims 16-17 are rejected under 35
U.S.C. § 103(a) as being unpatentable over Orr-McNeill as applied to claim 15 in view of
Kempf. Claims 18 and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over
Orr-McNeill as applied to claim 12 in view of (Guheen). Claims 21, 23, and 25 are rejected
under 35 U.S.C. § 103(a) as being unpatentable over Orr in view of McNeill, and Kempf.
Claims 22 and 24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Orr in
view of McNeill, Kempf, and Guheen.

Orr teaches a system and a method for executing commands on a specific virtual
desktop operating in a multi-server environment. Orr has defined the virtual desktop to be
any user logged on session in a multi-user server environment. According to Orr, a virtual
desktop is created each time a user logs on to a client. Furthermore, in Orr, a first process, a
virtual process broker (VP broker) executes on the server and communicates with a second
process, a virtual process agent (VP agent) also executed on the server (column 3, lines 42-
50). Here, the Office is comparing the VP broker and VP agent to local client and remote
client respectively in the claimed invention. Orr cannot reasonably be considered to disclose
or suggest Applicant's claimed invention where the local client and the remote client may be
any personal computer or any other networkable device that includes at least a memory and a
processor. The local client and remote client are real machines and not virtual processes like
in Orr. As such, peripheral devices may be attached to them, which is not the case with Orr's
virtual processes. Unlike Orr, in the claimed invention, the local client and the remote client
are not on the same server. In fact, either one of them can interchangeably act as a server or
as a client

Kempf teaches a method to create a connection between a GUI and a statically-typed
distributed object (column 3 lines 55-56). The adapter object performs functions such as data
translation. (Column 5, lines 26-29). The Office here is mistakenly making the assumption
that the adapter object in Kempf and the adapters in the claimed invention to be the same.
Kempf describes adapter objects which in a client/server distributed objects environment,
instantiate on demand server objects that service remote client method invocations. The
adapter object deals with activation of objects. Moreover, Kempf teaches that a connection is
established between adapter object and a surrogate object by setting an outlet instance

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variable of the adapter object to point to the surrogate object (column 5, lines 57-60). In contrast, the present invention teaches SCSI host adapters that look for connected devices and has nothing to do with object activation as described in Kempf. As a result, the combination of Orr and Kempf would not have taught the Applicant's claimed invention wherein a local client connects to a selected adapter of the remote client as if the selected adapter of the remote client were physically connected to the local client.

Guheen teaches a system, and method for providing a web architecture framework and for conveying various aspects of such web architecture framework (column 6 lines 55-59). The system provides a way to improve an existing network framework by prioritizing the existing components. In Guheen, the user identification and the passwords may be used to access each component in the system or to access the whole system (Column 148 lines 59-62). In Guheen, the user only has access to information stored in the web server. In contrast, in the claimed invention when a user at the local client wishes to communicate with the remote client the user double clicks on the remote client icon. When the remote client icon is double clicked, the remote SCSI connection GUI appears on the local client. The user then inputs a remote client identification (ID) and password specific to the local client. If the ID and password match then the local client communicates with a selected SCSI host adapter of the remote client and uses the selected SCSI host adapter as if the selected SCSI host adapter belonged to the local client. In the claimed invention, SCSI host adapters look for peripheral devices connected to the remote client and provide local client access to those peripheral devices. Thus, it is submitted that the combination of Guheen with Orr would not have rendered the claimed invention obvious.

McNeill teaches a SCSI emulation device and system for providing access to non-SCSI devices or SCSI devices on a non-local SCSI bus via a common SCSI bus. Furthermore, in McNeill, the initiator uses a standard input/output device driver for the given device and the target uses emulation code with redirection and/or translation routines to look like a standard SCSI device (Column 3 lines 28-30). In the claimed invention the local client establishes communication with the remote client using a DCOM enabled link and not through a SCSI bus. DCOM is a logical implementation that replaces the local interprocess communication provided by an operating system of a client with a network protocol. The network protocol allows direct connection between a local client and a remote client without the need for an intermediary system component. Therefore, it is submitted that one having ordinary skill in the art, reading the teachings of McNeill would not have been motivated to modify a SCSI emulation device using a common SCSI bus between an initiator and a target,

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that utilizes emulation code to look like a standard SCSI device, to arrive at Applicant's claimed invention. It is further submitted that the combination of Orr with McNeill would not have rendered the claimed invention obvious.

Additionally, to establish a *prima facie* case of obviousness based on a combination of references, there must be some suggestion or motivation, either in the references or in the knowledge generally available to one having ordinary skill in the art, to combine the references in the manner proposed. As explained above, the Examiner has not established *prima facie* case of obviousness against the claimed subject matter because one having ordinary skill in the art would not have combined Orr, Guheen , Kempf and McNeill.

In sum, Applicant respectfully submits that the combination of Orr, Guheen, Kempf, and McNeill does not raise *a prima facie* case of obviousness against the subject matter defined in independent claims 12, and 21 because: 1) the combination is based on an improper comparison of local client and remote client in the claimed invention with VP broker and VP agent of Orr, and 2) the requisite motivation to combine Orr, Guheen, Kempf and McNeill in the manner proposed by the Examiner is lacking. Thus Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. § 103(a) rejection of independent claims 12 and 21. In a like manner, dependent claims 2-5, 7,8, and 9-11 which incorporate each and every element of the independent claim 1 are patentable under 35 U.S.C. § 103(a) over any combination of the cited prior art for at least the same reasons discussed above. For the same reasons, dependent claims 13-20 which incorporate each and every element of the independent claim 12, are patentable under 35 U.S.C. § 103(a) over any combination of the cited prior art. Similarly dependent claims 22-25 which are patentable under 35 U.S.C. § 103(a) over any combination of the cited prior art since dependent claims 22-25 incorporate each and every element of the independent claim 21.

Conclusion

In view of the foregoing, the Applicant respectfully submits that all the pending claims 1-25 are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested.

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If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6903. If any other fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ROXIP142). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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